

EXHIBIT 31

June 17, 2005

RECEIVED
HCC NURSING DEPT

2005 JUN 27 AM 11:30

NORTH JERSEY
DEVELOPMENTAL CENTER
TOTOWA, N.J. 07511

Dear Mrs. Lotts:

I am writing you in reference to my job duties, and a small situation that occurred on June 15, 2005.

I returned to work, off of a leave of absent on June 1, 2005 upon my return I did not receive my job duties back, which I'm not sure what this is all about, but I don't have a problem with that simply because my job duties were overwhelming, and before I resume them back, I would like my job duties to be re-evaluated, to lighten the load on me.

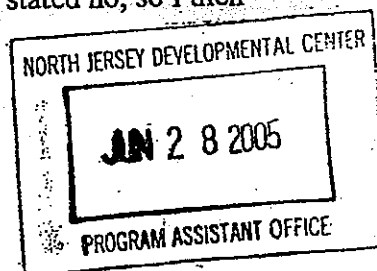
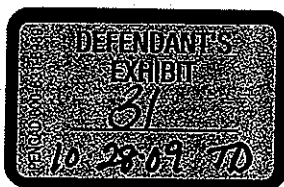
But I must tell you that I did get wind of a rumor that was out while I was out on sick leave, the rumor was, that Ms Wolke made statements such as If she has her way, that I

will not be getting my job duties back she will make sure that her friend Katia keep my job, and she will see that I get transferred out of the nursing department, but that is not my concern today. My concern is that I was instructed by you not to resume my job

duties back until further notice, you instructed me to take the opportunity to catch-up on

the information that needs to be updated in the computer. Which I did not see that as a problem, until I found out that all the client's data information sheet in the computer no longer exist. This means that every client data information sheet on these grounds has to be re-stored back into the computer. I am requesting a meeting with you to get some clarification on what is my assignment, you instructed me to take this opportunity to update the client's data information. This brings me to why I am writing you this semi complaint letter, on June 15, 2005 I called you to ask you would it be alright if I work thru my lunch to put the client's information in the computer, my request was approved by you. So I took the liberty to inform the head nurse Mike that you had authorize me to work thru my lunch, upon exiting the office he said to me oh ! By the way Phyllis, I would like to have a count of the data sheets you enter in the computer in a day, at that time I asked Mike, did you request this information from me, and he stated no, so I then

ATKINSON EEO 11



asked him who is requesting it. And he stated back to me does it really matter, I have a boss.

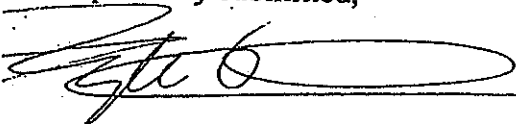
Mrs. Lotts I am a full grown Adult that has been working at NJDC for over twenty years, why am I being single out and treated differently, I have never had a problem with my work performance in the past to warrant this type of treatment, I am most certain that no one else that work in the same department that I am working in has to report to the supervisor at the end of the day to let them know how much work they are doing, as far as I am concern this is indirect discrimination, and harassment from Ms. Wolke.

I have zero tolerance for Ms Wolke unprofessional, nit picking behavior, her ways are foolish, and childish She has no intent on ceasing this behavior she reminds me of a poison snake, the only way that you can stop a snake from biting you is to kill it. And until Ms Wolke is reprimanded to the fullest extent of the law she will continue this type of behavior, she will also continue to believe that she is above the law, I would Ms

Wolke to be removed from having any authorization over me as far as giving me any orders directly or indirectly, her sole intention is to destroy me trust me when I say it.

Your help in this matter will be greatly appreciated.

Respectfully submitted,



Phyllis Atkinson

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HCC NURSING DEPT.
2005 JUN 27 AM 11:30
NORTH JERSEY
DEVELOPMENTAL CENTER
TOWNA, N.J. 07511

6/27/05
(RL)

ATKINSON EEO 12

EXHIBIT 32



NORTH JERSEY DEVELOPMENTAL CENTER

WORKPLACE VIOLENCE REPORT SUMMARY

July 15, 2005

I. Type of Incident:

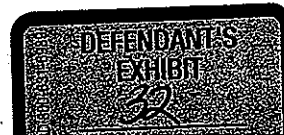
- ☐ Physical
- ☐ Verbal
- ☐ Property Damage
- ☐ Other

II. Location of Incident: N/A

III. Involved Parties: Ms. Carol Wolke and Ms. Phyllis Atkinson

IV. Brief Summary of Incident: On July 1, 2005 this writer was informed of the recent inter-office memo from Ms. Atkinson that expressed her discomfort with the way things were being handled relative to her supervision, job responsibility, and the alleged continuous harassment. Ms. Atkinson goes on to make a statement in her memo that could be perceived as a threat. On July 1 2005 this writer met with Ms. Carol Wolke to discuss her concerns as it relates to the above stated documentation, a memo addressed to Ms. Roxanne Lotts, DON, from Ms. Atkinson dated June 17, 2005 (stamped received June 27, 2005) stating her frustration with the on-going unresolved issues that are the subject of a previous complaint.

V. Summary of Statements and Interviews: On July 1, 2005 this writer met with Ms. Wolke to discuss her official complaint regarding the alleged threat in Ms. Atkinson's memo dated June 17th. Ms. Wolke indicated that she views the statement in the memo "I have zero tolerance for Ms. Wolke unprofessional, nit picking behavior, her ways are foolish and childish. She has no intent on ceasing this behavior she reminds me of a poison snake, the only way that you can stop a snake from biting you is to kill it." Ms. Atkinson goes on to further state that "until Ms. Wolke is reprimanded to the fullest extent of the law she will continue to believe that she is above the law". Ms. Wolke goes on to say that she is fearful of some kind of physical harm base on the content of this memo and the previous outstanding complaint. Ms. Wolke indicated that since Ms. Atkinson's return from her sick leave on June 1, 2005, she has not had any contact with Ms. Atkinson. Ms. Wolke indicated that they have been in common area, however has not had any interaction nor did she feel intimidated in her presence during these times. The previous arrangement was developed base on the formal complaint filed by Ms. Atkinson was that both parties would to remain separate. Ms. Wolke supervisory responsibilities would be suspended until the items of this complaint has been resolved. Ms. Wolke office is on the second floor and Ms. Atkinson's office is on the first floor of the Health Care Center. This arrangement minimized direct contact; however given the most recent development and Ms. Wolke expressed fear of physical harm this arrangement was no longer sufficient to address the seriousness of this situation. Ms. Roxanne Lotts was notified to make arrangement for a temporary worksite for Ms. Atkinson that would outside of the HCC. Ms. Wolke informed this writer that she has formally filed an official complaint to the EEO/AA office following her knowledge of this memo. Ms. Wolke indicated that at this point she would be very uncomfortable with a meeting to mediate this interpersonal difficulty. It is noteworthy to mention that at the time of this



interview Ms. Atkinson was scheduled to be on vacation for a week which would delay the interviewing of Ms. Atkinson further, as the previous complaint interview was not done due to Ms. Atkinson's sick leave.

On Wednesday July 20, 2005 this writer was contacted by Mr. Engel, ERO stating Ms. Atkinson was in the Administration building for a grievance hearing that was cancelled as a result of the charges being rescinded by her direct supervisor. Mr. Engel indicated that Ms. Atkinson had expressed some discomfort about the status on her outstanding complaint. Mr. Engel indicated that he had limited knowledge as to the status of her complaint but given Ms. Atkinson's apparent emotional state he would try to get some further information. This writer met with Ms. Atkinson in the presence of the CWA Union President Ms. Sara Evans, at this point Ms. Atkinson was informed that Ms. Wolke viewed the content of the memo dated June 17th as a threat and that the matter that was being investigated. It was further explained that due to the nature of the allege threat in the memo it is advisable that both parties remain separate during the course of the investigation. It was also explained that the situation appears to be emotional charged and that a temporarily re-assigned to MIS office has been arrange as a means of containing this situation. She will continue to do her assigned duties from that location. Ms. Atkinson expressed her discomfort with the fact that she was being re-assigned out of the Health Care Center and being displaced from her work-site and the same rule was not applied to Ms. Wolke at present time or at the time that she filed her initial complaint. This writer went on to explain that immediately after she filed her complaint to EEO/AA office she took a leave of absence, which circumvented any separation stipulations after her official complaint. Ms. Evan indicated that she understood the need to separate both parties during this investigation. Ms. Evan made significant effort to convince Ms. Atkinson that this is in fact in her best interest given the new development (memo dated June 17th) in this situation.

Ms. Atkinson was having a difficulty time comprehending the actions taken by the facility to date, partially due to her demonstrated emotional distress. Ms. Atkinson indicated that the language that was used in the memo in question was not meant to be a physical threat. Ms. Atkinson stated that the comment related to the snake was an analogy to emphasize the magnitude of the situation. Ms. Atkinson stated that in no uncertain term did she mean any physical harm to Ms. Wolke. This writer went on to explain the procedural action that would follow as a means of trying to provide further clarity to Ms. Atkinson's apparent confusion. Both Ms. Evan and this writer attempted to reassure Ms. Atkinson that this matter will be handle and addressed as quickly as possible, but aspect of this process is done outside of the facility. Ms. Atkinson was very insistent on the continued injustice that she perceives has been imposed on her. Ms. Atkinson continued to express what appears to her to be disparaging treatment. In several of her communication to Ms. Lotts, she did express a fear of retaliation from Ms. Wolke based on verbal threats and given that Ms. Wolke is an administrator at the facility. Ms. Atkinson's emotional distress became more apparent as the discussion continued to both Ms. Evan and this writer. In an effort to address the uneasiness of this situation, further discussion was ensued which included Mr. Engel and Mr. Werkheiser. Ms. Atkinson expressed her concerns to Mr. Werkheiser and Mr. Engel and after careful deliberation Ms. Atkinson agreed that she would trust that the strategies that were being presented is in her best interest. Ms. Atkinson agreed to the following:

- A temporary re-assignment to the office of MIS.
- Ms. Roxanne Lotts, DON would be her immediate supervisor.
- It was made clear that her actual work assignment would be as discussed at the June 28th meeting.
- All time-off requests will go directly to Ms. Lotts, in Ms. Lotts absence Ms. Boss MIS Director will approve her time-off request.
- Ms. Atkinson will provide a statement explaining in detail her choice of words used in the June 17th memo.

- Ms. Atkinson will report to Mr. Werkheiser's office upon her return to work, where Ms. Lotts will escort her over to the MIS office as a means of assisting with the transition.
- Ms. Atkinson indicated that she understood that once a satisfactory investigation on the memo in question was completed she would be permitted to return to her previous work station.
- It was made very clear to Ms. Atkinson by all involved parties that there would be no more scrutiny of her work performance than the usual practice.

Before terminating this meeting Ms. Atkinson was asked if she was if she was able to get back home on her own, she indicated that she was able to get herself home.

On July 25, 2005 this writer called Mike the Health Care Center Nurse and Ms. Atkinson direct supervisor (prior to this last agreement) as a means of trying to get some clarity to a statement in the memo in question which implied additional scrutiny to her work performance. Mr. Mike _____ was very uncomfortable with the question presented and indicated that he did not want to be placed in the middle of this confusion. He indicated that he did not ask for the role as a supervisor it was just something he inherited. When asked directly who instructed him to increase his level of supervision he indicated that he was not comfortable answering that question. Mr. _____ discontinued the discussion at that moment.

VI. Interventions Taken:

- Temporary re-assignment of Ms. Atkinson to a different work station outside of the Health Care Center.
- Ms. Lotts will assume direct supervision of Ms. Atkinson.
- ~~Both Ms. Atkinson and Ms. Wolke will be referred to EAS~~
- Ms. Atkinson was instructed to provide a statement explaining her alleged threat in the memo in question upon her return to work.
- Both parties were advised to report any contact with each other to Ms. Lotts immediately during the course of this investigation.

VII. Recommendations:

- Further follow-up and investigation on the fact related to this memo.

VIII. Report submitted by: Marcia Parchment, PA

IX. Date of this Submission: July 25, 2005

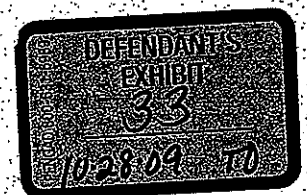
EXHIBIT 33

July 21, 2005

I am writing this letter as an addendum to my original complaint letters against the Assistant Director of Nursing Services, Ms Carol Wolke, which was written on, 12/1/04, and also as a correction to the letter that was written 6/17/05 to the Director of Nursing services, Mrs. Roxanne Lotts, I would like to say that I regret the choice of words I used in the letter of 6/17/05. I apologize for the misunderstanding that it has caused.

Every since Ms Wolke made her first threat against me, and I quote "I will fix you, just wait and see I will fix you". I have been treading on pins and needles. When Ms Woke gave me a red A, It was one of her many unjustly incidence against me. Ms Wolke has created a hostile working environment for me, and she will stop at nothing to retaliate against me.

To the readers of this letter I say, In order to comprehend that I was in no way making a threat to harm Ms Wolke. You would have to have the full concept of why I compared her with a snake; you would have to be well informed of how the birth of the above mentions incidence occurred. I was only trying to get the reader of the letter to feel the pain, and the anxiety that I am unremittingly experiencing. I was merely making a comparison to express my emotions and fears. I have been under a tremendous amount of stress since the very beginning of my original complaint against Ms Wolke.



I wrote the letter of 6/17/05 out of complete fear, and panic to be protected from Ms Wolke's threats, acts of discrimination, harassment, and verbal abuse against me, I was only trying to give the reader a vision of how distress I am feeling, and express to the reader how petrified I am of her continuing acts of harassment, if she is not reprimanded. That is why on my letter of 6/17/05, which was addressed to Mrs. Lotts, I emphasized so strongly to Mrs Lotts only because I was trying to describe a side of Ms Wolke that she might not be acquainted with.

The comparison was only to show the reader how intimidate I am feeling, And how dangerous she is to me in my mind. As I write this letter, I write it again in desperation praying and hoping that someone will see through her deceptive ways Ms Wolke, must be reprimanded in order for her unprofessional behavior to cease, before she gets the opportunity to bring her threats into a full circle against me.

I would never ever harm anyone physically or make a threat to harm anyone.

If you would look at this situation from my prospective you will see that I am within my rights to have the fears that I harbor within, I am constantly living in a state of fear at work, and I am experiencing high levels of anxiety attacks.

Please consider the following analogy for the reason of my wrong choice of words in the letter that was written to Mrs. Lotts, Director of Nursing Services on 6/17/05.

Ms Wolke is an administrator for North Jersey Developmental Center, and for the state of New Jersey, her position is one that I hold high regard. Her position as an administrator holds the same authority over my job as the President of the United States over America. To hold one of the highest titles at North Jersey Developmental Center, and as an administrator of an organization as large as North Jersey Developmental you do not anticipate unprofessional behavioral to be tolerated or even exist among the most learned people, people who you are trusting to do what is right no matter who it is or what the circumstances incline.

It gravely concerns me when Ms. Wolke is allowed to take contexts of my letter and conceive it as to be a threat to her life; the behavior that she is exhibiting is one that needs to be dealt with immediately without any delay. As of this Day 7/27/05 one year, and three months from my first complaint I continue to live under her wrath.

Please allow the following analogy to help you realize the emotional stress and strain that I am under.

If you would just for a moment imagine that you work for the President of the United States, and he made a threat against you, not only did he make a threat, but it is also your belief that you have been previously discriminated against by him because of the color of your skin. So you file a complaint against him, with the senator's office, whose job is to assure that all employees are being treated fairly, but your complaint goes un-answered. You are aware that because he is the President of the United States, he does

have the authority to make his threat a reality to destroy you if he so chooses.

Now just imagine that you are continually hearing rumors, rumors that the President of the United States has said that he is looking for a legal way to cause you to lose your present job, and the rumors are ended in saying that you will never get a job in the United States ever again, you also have heard the rumors about the President's brother, who works in the Attorney General Office; and he has made statements that he will help the President find away to destroy you, but you continue to trust that the senator is still in favor of doing what is right for the both of you, so you write to the senator again requesting that action be taken against the President of the United States because you feel his behavior is out of control, and unprofessional, you

want the senator to realize that this person appears to you, to have a personality disorder so you use an analogy to describe him so that the senator could get the full picture of what you are describing, so you write a

letter to the senator and mailed it off, but some how the letter was intercepted by the President, so now the President of the United States know all the contents of what is in the letter, but there is one problem he can not reveal the contents of the letter because it would expose him..

The President realizes that the charges that were brought against him by the writer of the letter is very serious, he realizes that he needs away out of this mess that he has gotten himself in, so he sees an opportunity in the letter where the writer mistakenly uses the wrong choice of words in the letter to describe a situation. The President sees that he could take advantage of this error that the writer made, but there is only one problem how do he let the senator know that he is knowledgeable of the contents of the letter without exposing himself. So what does he do, he deceives the senator into believing

that he has heard rumors about the letter, which contain threats to his life, so he demands to see the letter, not only did he demand to see the letter, but he threaten to have the writer of the letter arrested, if his demands were not met. So now, the President does not have to reveal how he knew the contents of the letter before hand. If he was ever asked how did he find out about the contents of the letter? He could always say that the senator showed it to him without ever being exposed.

The sole purpose of the President demanding that the letter be revealed to him was to hide the fact that he had interceded the letter before hand, and it would have been impossible for him to reveal the contents of the letter ~~without making his demand to see the letter.~~

Now, imagine that the letter that you had written to the senator trying to describe the President's bizarre behavior and at the same time you used a comparison to give the reader a more detailed vision of what you are seeing in this person, the letter that you wrote in your defense was now deliberately being taken out of it's context solely for the purpose of retaliation against you.

Now, feel the magnitude of the stress that you would be under, when someone talks about your lively hood, and although you had previously requested for help, only for it to be ignore, and false charges were charged against you, despite your cry out for help, when you know you have did all the right things from the very beginning of the incident. It becomes un-easy to trust anyone within system about your job.

A job that you have invested twenty- five years in, and in that twenty- five years you have work to the best of your ability to perform your duties,

always making sure that you follow the rules and regulation so that no charges can ever be file against you unjustly.

But because one day you reported the President of the United States to the senator that he has threaten you, and that he has issues that are not professional, and that his behavior could be detrimental to you, and to anyone else that crosses his path, as any human being your anxiety, and fear escalates. Your fear and emotion are now to a degree that you feel like you are in desperate need for immediate help, you know that you have asked the appropriate people for help, but because your charges are against the President of the United States no one wants to believe that the President of the United State could have characteristic such as you are describing. So it becomes much easier to make you look like the bad guy even though you

pleaded for help in a timely manner before the President could bring any charges against you, you follow the protocol in reporting the President, but somehow it did not work for you, The stress of it all becomes over

whelming. With the President of the United State threat hanging over you, you know that any day everything you ever worked for could be change at anytime, so you now live in a constant state of fear so would it be un usual for a person in that state of mind to use the wrong choice of words while explaining her self, and would it be unusual for you to have feelings of fear, anxiety, put your self in my place and imagine the person that is in charge of your job saying to you, what she said to me and I quote "just wait and see I will fix you" Because Ms Wolke has been so successful in the past at convincing Mrs. Lotts that I am wrong in what ever she does to me, surely you must can understand why I live in the state of fear and anxiety. Please allow me to inform you of how the unjustly red A against me was birth, It was not birth out of an argument with Ms Wolke, and, it was not birth out of

us not communicating with each other, nor was it birth out of us being angry with each other. As a matter of fact, I had allowed Ms Wolke to befriend me, after her threats from the previous complaints that I have against her.

Ms Wolke, befriended me as I stated in my original complaint letter for the soul purpose of harming me, when Ms Wolke brought charges against me she, and I were on a communicating, and socializing basis as a co-worker, and friends, she spent several hours a day in my office talking about her boyfriend and other personal matters in her life, often times I would even console her on some of the problems that she was going through with her friend or boyfriend, I would often spend time with her because I really thought she needed a friend to talk to about her boyfriend or friend so because of this relationship that we had, I could have never guessed in a

million years that she was capable of bringing such a serious action as a red A on my twenty-Five years of work record. It was out of the blue, when I say out of the blue, I mean out of the blue. So this was the reason I compared her with a snake her act toward me was cunning.

I have had numerous unjustly action taken against me by Ms Wolke but nothing to this magnitude.

Because she went out of her way to befriend me, I did not pursue the original complaint letter with urgency, because I was trying to avoid what I am going through now with her. With urgency and without delay I would like to pursue these false accusations, I have never threaten to harm Ms Wolke or threaten to kill her I am traumatized by this recent accusation against me it my belief that she is using my bad choice of words as a way to of escape from her unlawful acts against me, the threats, the harassment, verbal abuse, and discrimination has all left me unhappy.

To the reader I say to you, that you would have to realize and understand the shock and trauma that my mind has been under, when you are deceived in a way that I was deceived it could be quite disturbing.

But again I say I would never harm another person knowingly, but I also need to say again that Ms Carol Wolke has upset me so badly that I am always nervous, and I don't feel safe in my work environment.

The effects of the continuing stress and tension have wore me down and I think that basically this is why I said what I did, I was only trying to paint a picture in the readers mind of how dangerous and threaten I am feeling it is unfortunate that I used the wrong choice of words to describe my pain, but I wanted the reader to realize that if she is allowed to continue getting on with this type of behavior without being reprimanded I would have to continue

living in the state of mind that I am living in, and that is fear you have to realize with the rumors and the opening of my personal mail, and a number of other illegal miss- haps I was only trying to describe the harassment, and the pain that I am experiencing,

After hearing the rumors, about my job and other negative rumors, and by the rumors appearing to be true, I was driven by my emotions to use the wrong choice of words, It my request that you continue to take my complaint seriously and as a priority please do not take my complaints lightly, as they have been taken in the past, I am feeling that the only way I can be safe from Ms Wolke is to not be on the same grounds that she is on. Because she is creating a hostile working environment, until this situation is dealt with she will continue to look for ways to bring me down, Ms Wolke wants to retaliate against me, and if you would look at the whole picture you will plainly see that, and while she is trying to get the focus off of herself,

and on to me. It is my prayer that God has many angels around me because it is my opinion that she will go to any extreme to have her way,

I wrote this letter to Ms Lotts because of the on going rumors that begin to intensify, it was written for the soul purpose of being re-assured that I will be protected from Ms Carol Wolke abuse and harassment, It was to let her know that I am still living and working in a state of fear from the previous threats, and harassments and unprofessional behavior that Ms Wolke has displayed. Because of the unending rumors that I was hearing about my job rumors of being removed from the Health Care Center, and that my job duties would not be returned to me. I became overwhelmed that is the reason, why the emotions of fear, and anxiety found a home in my mind.

It is quite alarming to be hit by Ms Wolke unjustly attacks again. I was not expecting to have to defend my self once again from her unprofessional behavior and deceiving ways.

I feel like I am receiving a modern day lynching from Ms Wolke while being hit by friendly fire.

Again I say please accept this letter as an apology to all who misunderstood it to be a threat to Ms Wolke.

My personality does not comprise of revenge, reprisal, retaliation, hate
90% of my time is spent helping other people my time is never spent
thinking of ways to harm another human being. That is so unlike my
character for those of you who know me you know that, but for those of you
who don't know me personally, please have a glimpse into my personality,
and character by viewing and reading the enclosures.

P.S. I avoided using the word anger in this letter because I did not want it to
be interpreted the wrong way, Just for the record anger is an emotional
reaction indicating that something is wrong, and that something needs to be
done anger for me is intermingled with hurt and pain.

Respectfully submitted

Phyllis Atkinson

C: file
Mr. E. McCabe, EEO, Trenton
Federal Office Of EEO, Newark
Commissioner Davy, Dept of Human Services
Theresa C. Wilson, Deputy Com, Governor office
Mr. B. Werkheiser, CEO
Ms. M. Parchment,
Ms. S. Evans, Union
Mr. G Engle, Ero
Mrs. R. Lotts, DON